

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

NATALIA CEBOLLERO BERTRÁN  
Plaintiff

v.

PUERTO RICO AQUEDUCT AND SEWER  
AUTHORITY.  
Defendant

CIVIL NO. 3:19-cv-1412 GAG-  
BJM

VIOLATIONS OF CLEAN  
WATER ACT, NEGLIGENCE;  
RIPARIAN RIGHTS

JURY TRIAL DEMANDED

**MOTION TO REQUEST CLARIFICATION OF MINUTE**

TO THE HONORABLE COURT:

NOW COMES PLAINTIFF, represented by the undersigned counsels, and respectfully states and prays as follows:

1. Yesterday, on August 25th, 2021, the Initial Scheduling Conference (ISC) was held with all counselors of record present. The Joint ISC Memorandum was discussed, and a discovery plan set, with several due dates set for all parties. In that sense, all discovery is to be concluded by February 28th, 2022, and dispositive motions have to be filed on or before April the 1st, 2022.

2. Later, the minute of the ISC was entered (Dkt. No. 30). According to our notes, parties agreed that the expert witnesses' reports were to be due on **November the 30th, 2021**. Nevertheless, on the ISC minute, it stated that the due date was November 20, 2021.

3. Parties honestly understood that the due date was **November 30th, 2021**, as it was suggested particularly by Plaintiff's counsel and agreed upon by PRASA's counsel. In that matter both Plaintiff's counsels have their notes and both agree that the due date for the expert witnesses' reports is November 30th, 2021.

4. Accordingly, Plaintiff requests, as a clarification, that the due date for the expert witnesses' reports should be **November the 30th, 2021**, and not November 20th, 2021, as it was entered in the minutes of the August 25, 2021, ISC proceedings.

WHEREFORE, plaintiff respectfully requests the Honorable Court that the Minute be clarified as to set the due date for the submittal of the expert witnesses' reports by November 30th, 2021.

RESPECTFULLY SUBMITTED.

At San Juan Puerto Rico, August 26, 2021.

**s/ José Luis Ramírez de León**  
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### CERTIFICATE OF SERVICE

I hereby certify that on **August 26, 2021**, I electronically filed the foregoing motion, titled **MOTION TO REQUEST CLARIFICATION OF MINUTE** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

- José L. Ramírez de León, [jlr Ramirez639@msn.com](mailto:jlr Ramirez639@msn.com) [jose lramirez@me.com](mailto:jose lramirez@me.com)
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At San Juan Puerto Rico, **August 26, 2021**.

**s/ José Luis Ramírez de León**  
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